INLAND SEAS ENGINEERING

TRANSMITTAL LETTER

To: Sy Paulik
Water Division
120 West Chapin Street
Cadillac, Michigan 49601-2158

Date: January 17, 2003

Project: Williamsburg Receiving and Storage

Project No: 02399084-07E

We transmit:
(X) herewith
( ) under separate cover

For Your:
( ) approval
( ) review and comment
(X) use

The Following:

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Remarks:

Please feel free to call with any questions

Copies To:
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By: Mindy D. Walters, PE

Table 1
Historical Spills and Response Actions

Williamsburg Receiving and Storage, LLC
10190 Munro Road
Williamsburg, MI

Date	Material	Volume	Location	Action Taken
August '02	Brine	<10 gallons	Shipping and Receiving	c/u with wet vac and scrubbed
June '02	Brine	<10 gallons	NW Brine Pits	Pumps in secondary containment, staff educated and responsible for all actions they direct.
Prior to 7/22/02	Waste Materials	Roll-off Dumpster	S. Side of Maintenance Building	Moved Trash Compactor inside the building and c/u waste materials
8/1/2002	Brine and Cherries	One (1) Tote	E. Side of Plant	No totes stored outside building, c/u area
9/10/2002	Brine	<5 gallons	Near Propane Tank	Brine Tanks Removed
9/17/2002	Brine	< 5 gallons	Shipping and Receiving	Cleaned pavement, utilized socks to reduce possibility of migration

Legend:
c/u: Cleaned Up
S: South
E: East
W: West
N: North

Table 2
Vehicle Listing
Williamsburg Receiving Storage, Inc.
10190 Munro Road
Williamsburg, Michigan

SWPPP Unit #	Year	Make	Description	Lic. Plate #	WRS Unit #
WRS001	2001	Peterbilt	Black	RQ7451	TR103
WRS002	2000	Peterbilt	Black	RQ7450	TR102
WRS003	1995	Peterbilt	Black	RQ7423	TR104
WRS004	1995	Peterbilt	Black	RQ7422	TR105
WRS005	1974	Ford	Dump		TR106
WRS006		Mack	Dump		TR107
WRS007	1997	Skytrack	JCB		E20
WRS008	1996	33' AWD	Scissor Lift		SL21
WRS009	1997	Mountainaire	Motor Home		
WRS010	1980	Ford	Loader		
WRS011	1987	Rous	Flatbed	Y55838	T117
WRS012	1989	Trailmobile	Flatbed	Y55839	T108
WRS013	1995	Transcraft	Flatbed	X59256	T110
WRS014	1994	Fontaine	Lead Train	Y55844	T111
WRS015	1995	Fontaine	Pup Train	Y55843	T112
WRS016	1996	Dorsey	Flatbed	Y55845	T113
WRS017	1998	Dorsey	Van	Y55849	T105
WRS018	1999	Dorsey	Van	Y55850	T107
WRS019	2000	Dorsey	Van	X59250	T101
WRS020	2000	Dorsey	Van	X59251	T102
WRS021	2000	Dorsey	Van	X59252	T103
WRS022	2000	Dorsey	Van	X59249	T104
WRS023	2000	Dorsey	Flatbed	X59248	T109
WRS024	1996	Benson	Train	6C6252	T114
WRS025	1996	Benson	Train	6C6251	T115
WRS026	1998	Talvert		6C6253	T116
WRS027	1978	Spins			
WRS028	1988	Fruehauf	Dump		
WRS029	1986	Fruehauf	Dump		

Table 2
Vehicle Listing
Williamsburg Receiving Storage, Inc.
10190 Munro Road
Williamsburg, Michigan

SWPPP Unit #	Year	Make	Description	Lic. Plate #	WRS Unit #
WRS030	2001	GMC	Pick-up	8902JJ	100
WRS031	1996	GMC	Pick-up	2599HS	99
WRS032	2002	GMC	Pick-up	9057KL	106
WRS033	2000	GMC	Pick-up	E9549M	
WRS034		John Deere	1020 Tractor Diesel		
WRS035		John Deere	1020 Tractor Gas		
WRS036		John Deere	2640 Tractor Diesel		
WRS037		John Deere	2640 Tractor Diesel		
WRS038		John Deere	2550 Tractor Diesel		
WRS039		John Deere	6410 Tractor Diesel		
WRS040		John Deere	2440 Tractor Diesel		
WRS041		John Deere	2840 Tractor Diesel		
WRS042		John Deere	Jeep Fork Truck		
WRS043		Chevrolet	State Truck		
WRS044		Dram-Whelan	500-Gallon Sprayer		
WRS045		FMC	500-Gallon Sprayer		
WRS046		FMC	100-Gallon Sprayer		
WRS047		Weed Sprayer	100-Gallon Sprayer		
WRS048		Komatsu	Truck		4
WRS049		Toyota	Truck		1
WRS050		Toyota	Truck		8
WRS051		Toyota	Truck		7
WRS052		Toyota	Truck		6
WRS053		Toyota	Truck		3
WRS054		Toyota	Truck		2
WRS055		Toyota	Truck		5
WRS056					
WRS057					

Table 2
Vehicle Listing
Williamsburg Receiving Storage, Inc.
10190 Munro Road
Williamsburg, Michigan

SWPPP Unit #	Year	Make	Description	Lic. Plate #	WRS Unit #
WRS058					
WRS059					
WRS060					
WRS061					
WRS062					
WRS063					
WRS064					
WRS065					
WRS066					
WRS067					
WRS068					
WRS069					
WRS070					
WRS071					
WRS072					
WRS073					
WRS074					
WRS075					

Exemption 9

Standard Operating Procedure No. 1

Storage and Cleaning of Totes

Williamsburg Receiving and Storage
10190 Munro Road
Williamsburg, MI

1.0 Introduction

The purpose of this Standard Operating Procedure (SOP) is to identify the proper procedures for storage and cleaning of totes utilized in the processing of fruit at the Williamsburg Receiving and Storage Facility (WRS). This practice is to be utilized at all WRS owned or operated facilities.

2.0 Reference Documentation

Michigan Department of Environmental Quality (MDEQ) general permit MIS519000, storm water from industrial activity in cycle-year 5 watersheds

3.0 Terminology

3.1 Totes- Containment vessels for the storage of agricultural products including but not limited to: cherries, apples or peaches

3.2 Yellow Totes- Totes associated with the transfer of fresh products, intermediate products and finished products within the plant.

3.3 Grey Totes- Totes utilized for storage of plant by-products prior to disposal as a fertilizer

3.4 Blue Totes- Totes utilized for plant by-products

3.5 Wood Totes- Not used in the plant operations, all wood totes at the site are associated with the transfer of fresh fruit or intermediate materials from off-site sources.

4.0 Significance and Use

Williamsburg Receiving and Storage LLC (WRS) is ~~an agricultural~~ processing facility for fruit. Processing at the plant includes storage of fresh fruit, intermediate products, by-products and finished products. Storage of these products includes utilization of totes and other containment structures.

The general permit WRS currently has for waste water at the site does not include cleaning of these structures and allowing the residual water to enter the irrigation system water, therefore currently all residual water must be shipped to an off-site waste water processing facility.

This SOP should be utilized for all tote cleaning and or storage.

Standard Operating Procedure No. 2

Standard Operating Procedure for Brine Transfer

Williamsburg Recieving and Storage
10190 Munro Road
Williamsburg, Michigan

1.0 Introduction

The purpose of this Standard Operating Procedure (SOP) is to provide the minimum acceptable protocols for brine transfer. The intent of this SOP is to provide safe handling practices for workers at Williamsburg Receiving and Storage and to prevent a spill or leaks.

2.0 Referenced Documents

2.1 Storm Water Pollution Prevention Plan, Williamsburg Receiving and Storage.

3.0 Definitions

3.1 Brine Transfer- The movement of brine solution at the site. This includes but is not limited to: Initial Brine transfer from the plant to the pits, movement of the brine within the pits, transfer of brine and cherries mixture to the plant for processing.

3.2 Pits- The intermediate processing location where fresh cherries are introduced to "brine". This may include lined depressions in the earth or tanks within a building.

3.0 Equipment Requirements:

Industrial Grade Flexible Hose (s)
Drip Pans
Pump
Pump Containment Structure
Liner(s), as necessary

4.0 Procedures:

Prior to any movement of brine it is the responsibilty of the crew to ensure that:

- Precipitation events are not probable during the time required to conduct the transfer.
- There are no visible signs of degraded, cracked or otherwise compromised piping
- All valves at the header system are turned off prior to initiation of pumping
- All secondary containment structures (drip pans) are in good shape suitable for the proposed use.
- All staff are trained to the appropriate immediate response procedure associated with the loss of brine material.

4.1 Initial transfer of brine into tanks/pits

WRS has installed a double line pipe from the brine point of origin to the brine pit header location. Brine should be pumped from the brine mixing tanks with the following steps adhered to:

1. Initial start-up of the brine shall be a ¼ of the normal flow rate.
2. Visual inspection of all lines and connections to be made to ensure the no losses are present
3. After sufficient time has elapsed to ensure that no losses are present, slowly increase flow to normal operation pressure.
4. At all times the line and connections should be monitored for losses.
5. Connections to the header system will be made in a manner that does not allow for any losses.

4.2 Freshing up the Pits:

It is necessary to freshen up the sulfate levels in the pits at interval deemed appropriate by management. The operation is to be facilitated in similar fashion as Initial transfer of brine into the tanks/pits.

4.3 Transferring of Cherries and Brine

Transferring of a Cherry and Brine mixture to the plant from the Pits is similar operations as the transferring of brine to the pits originally.

5.0 Documentation

It is necessary to keep an adequate record of the location of hazardous substances at the site at all times, therefore it is necessary to document the transfer of all materials and the approximate quantity transferred. This will also allow for a double check on the potential for losses during the transfer.

All documentation of line transfers should be maintained in the brine transfer log, Attached Form.

Standard Operating Procedure No. 3

Sampling and Handling Procedures Associated with Storm water Monitoring

Williamsburg Receiving and Storage, LLC.
10190 Munro Road
Williamsburg, Michigan

1.0 Scope

The general permit requirements associated with discharging of storm water run-off require that the runoff be monitored twice a year for certain constituents. The purpose of the Standard Operating Procedure is to allow for sampling of this run off.

2.0 Referenced Documents

.1. 40 CFR Subchapter D- Water Programs, Part 122- EPA Administered Permit Programs: The National Pollutant Discharge Elimination System.

.2. General Permit No. MIS519000 – Michigan Department of Environmental Quality, National Pollutant Discharge Elimination System wastewater discharge general permit, Storm water from industrial activity in cycle year 5 watersheds.

3.0 Terminology

.1. Storm water- As defined in 40 CFR Part 122, Storm water means storm water runoff, snow melt runoff and drainage.

4.0 Significance and Use

Based on storm water sheet flow across the site it is likely that if impact to storm water was present at the site, the most probable place to sample run off is near at the detention basin discharge pipe located approximately 700 feet north of the Munro Road, Angell Road intersection. Sampling is required twice annually and it is the storm water operator discretion as to the rainfall event that they determine appropriate to sample.

5.0 Sampling

.1. Equipment Requirements

.1.1. Gloves- Clean latex gloves

.1.2. Sampling Containers- Laboratory supplied containers, associated with the laboratory QA/QC program. (see Attached Map for Lab Contact Information)

.1.3. Cooler with Ice

.1.4. Chain of Custody

.1.5. Labels / Pen

.1.6. Paper Towel

.1.7. Transfer vessel- Such as a decontaminated Flask

.2. Storm water Sampling

During a Storm water event that produces a significant sheet flow, the sampler shall don a clean pair of latex gloves and utilize a decontaminated transfer vessel. Collection of the sheet flow will be acquired by placing the rim of the transfer vessel to the top of the sheet flow to collect a sample within the container.

Sampling Parameters	Min. Volume	Preservative
Oil and Grease	1000 ml	
pH	250 ml	
BOD_5	500 ml	None
COD	250 ml	H_2SO_4
TSS	1000 ml	
Total phosphorus	250 ml	H_2SO_4
Total Kjedahl Nitrogen	250 ml	H_2SO_4
Nitrate plus nitrite nitrogen	250 ml	H_2SO_4

Secure lids to all containers and place a label on each container. All containers should be transferred to the cooler with ice to maintain a temperature of 4° C. Complete chain of custody and transfer cooler and contents to the laboratory.

6.0 Record Keeping

All samples shall be identified with distinctly different identification to identify the date and time of the sample. Additional information that shall be recorded on the sample collection sheet is the storm duration, start and end time and recorded rainfall, as available. Please refer to the attached Storm water sampling report for documentation purposes.

Standard Operating Procedure No. 4

Procedure for Sampling and Handling Storm Water in Brine Pits

Williamsburg Receiving and Storage
10190 Munro Road
Williamsburg, Michigan

1.0 Introduction

The purpose of this Standard Operating Procedure (SOP) is to provide the minimum acceptable protocols for the sampling of storm water associated with brine pits. This SOP intends to provide safe practices and procedures for storm water sampling.

Specific conductivity is proportional to the concentration of ions in water and should serve as a field indicator of the degree of brine concentration. The specific conductivity of the water in brining pits will be measured in the field. Samples will be collected from approximately 20% of the brining pits for further laboratory analysis. The number and location of samples selected for laboratory analysis will be dependant on the conductivity measurements of each pit.

2.0 Referenced Documents

2.1 40 Code of Federal Regulations (CFR), Part 122
2.2 SWPPP for Williamsburg Receiving and Storage (WRS)
2.3 Standard Operating Procedure No. 9- Decontamination Procedures

3.0 Terminology

3.1 Brine Pits- The intermediate processing location where fresh cherries are introduced to "brine." This may include lined depressions in the earth or tanks within a building.
3.2 ORP- Oxidation Reduction Potential
3.3 Storm water- As defined in 40 CFR Part 122, Storm water means storm water runoff, snow melt runoff and drainage.
3.4 SWPPP- Storm Water Pollution Prevention Plan for WRS

4.0 Significance and Use

Storm water directed to brine pits have the potential to be contaminated from brine and cherry residue. A storm water characteristic evaluation is necessary before the storm water can be properly discharged or otherwise disposed.

5.0 Equipment

5.1 Sampling Equipment

- Conductivity meter, ORP meter, and pH meter
- Approximately 14-foot plastic PVC pole (approximately ½ inch diameter)
- 500 ml plastic wide-mouth sampling collection bottle
- Distilled Water
- Sample Bottles (see Section 5.3)
- Cooler and ice
- Chain of custody

- Duct Tape, and sharp knife

5.2 Safety Equipment

- Rope
- Personal Flotation Device (PFD)
- Safety glasses and latex gloves
- Cell phone/two-way communication device (water proof)

5.3 Test Parameters, Container Listing, and Preservatives

The following table lists the analytical parameters, bottle type and size, and preservative (per sample) to be used in storm water sampling:

Parameter	Bottle	Preservative
Ammonia	One (1) 250 mL, plastic	H_2SO_4
Total phosphorus		
Aluminum	One (1) 250 mL, plastic	HNO_3
Iron		
Manganese		
Sodium		
Chloride	One (1) 125 mL, plastic	No Preservative
Nitrate		
Nitrite		
Sulfate		

Sample bottles, labels and chain-of-custody forms may be ordered from SOS Analytical Laboratories.

6.0 Safety

The steep slope and slippery lining on the pits pose the greatest risk to the sampler. The sampler should maintain a "buddy system," to check-in every 15 minutes with WRS office. In case of a fall-in, the sampler should:

- be equipped with a PFD, to reduce the risk of drowning
- be tethered to a large stationary object with strong rope, to assist in rescue
- have a cell phone/communication device (water-proof) handy to alert a rescue team.

Safety glasses and latex gloves should be worn at all times to avoid direct contact with the storm water.

7.0 Procedure

7.1 Initial Sampling

- Prepare and assemble the PVC pole with the plastic sample collection bottle attached with duct tape.

- After putting on a fresh pair of gloves, the pole and attached sample collection bottle will be used to retrieve a storm water sample from the pit. Contact with the pit liner should be avoided.
- A sharp knife will be used to cut the duct tape and remove the bottle for ease of field testing, transferring storm water to the appropriate sample containers, and decontamination.

- Measure and record the conductivity of the storm water sample. Personnel using the conductivity meter should ensure that the meter is properly calibrated and that all procedures described in the users manual are followed.
- After measuring the conductivity of the storm water sample, the storm water will be discharged back into the same pit.
- The sample collection bottle, wetted section of pole, and conductivity meter will be decontaminated between sampling events, following decontamination procedures outlined in SOP-9.
- The steps presented above will be repeated to measure the conductivity of each of the brining pits.

Initial sampling will include two conductivity measurements per pit: one sample taken from the edge of the pit and another from the center. If consistent readings are established between the two measurements, only one measurement may be taken from subsequent pits. If inconsistent conductivity readings are noted between the center and edge of the pits, the most conductive sample location from each pit will be recorded for possible secondary sampling (discussed below).

7.2 Secondary Sampling

Following the conductivity measurements, approximately 20% of the pits will be re-sampled and collected for laboratory analysis. A minimum of one (1) sample will be collected and submitted. The pits with the highest conductivity readings will be selected for re-sampling and laboratory analysis. The procedure for re-sampling will follow the initial sampling procedures described in Section 6.1. These samples will be stored in a cooler and maintained at $4^{O}C$, and submitted to SOS Analytical Laboratory. All data collected and sample locations will be recorded and labeled.

The pH and ORP measurements will be done in the field. Personnel using the pH and ORP meters should ensure that these meters are properly calibrated and that all procedures described in their respective users manual are followed.

Field notes will be recorded during all sampling activities. These notes should include details of sampling locations, diagrams, field measurements, and other notes. A field form for recording field measurements, and a completed, example-chain-of-custody form are attached.

7.3 Post Sampling

All sampling equipment and accessories will be properly stored. All on-site equipment removed/repositioned due to the sampling process will be brought back to its original location.

Standard Operating Procedure No. 5

Spill Response Pollution Prevention Procedure and Countermeasures

Williamsburg Receiving and Storage
10190 Munro Road
Williamsburg, MI

1.0 Introduction

The purpose of this Standard Operating Procedure (SOP) is to develop standards of practice to help prevent releases to the environmental, and response action to eliminate/limit impact to the environment.

2.0 Referenced Documents

2.1 SOP No. 1- Tote Storage
2.2 SOP No. 2- Brine Transfer
2.3 SOP No. 5- Spill Response and Pollution Prevention
2.4 Emergency Planning and Community Right to Know Act, Title III, Superfund Amendments and Reauthorization Act (SARA).
2.5 Michigan Administrative Code, Part 5 Rules- Spillage of Oil and Polluting Materials

3.0 Terminology

3.1 DOT: Department of Transportation
3.2 Hazardous Substances: Any substance that poses an unacceptable risk to the public, health, safety, or welfare, or the environment, considering the fate of the material, dose-response, toxicity, or adverse impact on natural resources.
3.3 Intermediate Raw Materials: brine cherries, by-products, pits, etc.
3.4 Large Spill:Release of a substance in a quantity greater the five (5) gallons
3.5 Small Spill: Release of a substance in a quantity less than five (5) gallons
3.6 Secondary Containment Structure: means a unit, other than the primary container in which significant materials are packaged or held, which is designed and constructed so that the significant material cannot escape there from by gravity, through sewers, drains, or otherwise directly or indirectly into any sewer system or to the surface or ground waters of the state.

4.0 Significance and Use

This Standard Operating Procedure should be utilized to cleanup any material that comes in contact with the impervious surfaces of the operations at Williamsburg Receiving and Storage. The only exception to this is precipitation (rain, snow, sleet, etc.). Sand and dust also requires attention through parking lot sweeping.

Note: Part 5 Rules, Rule 6 requires a pollution incident prevention plan within 24 months of the effective date of the rules. At this time, Williamsburg Receiving and Storage is determining the best method for compliance with the rules. Therefore,

prior to August 1, 2003, this SOP will be amended to comply with the requirements for the Pollution Prevention Plan. This is an interim spill prevention plan.

5.0 Equipment (Spill Response Kit)

Drain Covers	Booms/ Absorbent Socks
Latex/ Chemical Resistance Gloves	Safety glasses and/or goggles
Drum Labels	Wet/Dry Vacuum
Labels	Floor Scrubber

6.0 Prevention of Spills

6.1 Petroleum Based Products

6.1.1 All Hazardous Substances will be stored inside the maintenance building, or other enclosed areas.

6.1.2 Any drums or containers (> 1 gallon) stored onsite that contain hazardous substances will be maintained utilizing drum secondary containment.

6.1.3 Petroleum Based Products will be stored on-site in quantities that meet the immediate need for plant processing and associated maintenance.

6.1.4 All Containers containing hazardous substance will be labeled in accordance with applicable, Michigan Right to know laws.

6.2 Brine Containing Materials

6.2.1 Follow procedures identified in SOP No. 2- Brine Transfer

6.3 Cleaners, and Solvents

6.3.1 All Cleaners and Solvents will be stored inside the maintenance building, or other enclosed areas.

6.3.2 Any drums or containers (> 5 gallons) with cleaners or solvents will be stored utilizing appropriate secondary containment.

6.3.3 Cleaners and Solvents will be stored onsite in quantities that meet the need for plant processing and associated maintenance.

6.3.4 All containers containing cleaners, and solvents will be labeled in accordance with applicable, Michigan Right to know Laws.

6.4 Intermediate Raw Materials

6.4.1 All intermediate materials will be stored in gray or blue totes, with lids or other types of covering to prevent storm water from coming in contact with the contents.

6.4.2 Intermediate materials will be removed from the site in a timely manner, such that a maximum of ten (10) full totes are on-site at any time.

7.0 Spill Response Plans

This section describes spill response plans for a variety of materials that are used or stored at the Williamsburg Receiving and Storage. WRS uses a variety of materials,

some of which may be hazardous or may cause adverse environmental effects. These substances may include, but are not limited to:

- Lubricating Oil & Waste Oil (Maintenance Shop)
- Brine (Plant, Pit area, Transfer Lines, etc.)
- Cleaners, Solvents
- Intermediate Materials (Cherry Pits, Etc.)

7.1 SPILLS OF OIL, OR OTHER PETROLEUM BASED PRODUCTS

7.1.1 Small Spill (<5 gallons)

1) Spread Absorbent
2) Place absorbent material into DOT approved container
3) Clean area to prevent trip and fall hazard
4) Contact Rick Banwell for labeling and disposal instructions

7.1.2 Large Spill (> 5 gallons)

1) Seal all drains in the vicinity
2) Place a boom to prevent migration of the spill
3) Contact Mr. Rick Banwell for additional directions

7.2 SPILL OF BRINE

7.2.1 Small Spill (<5 gallons)

1) Seal all drains in the vicinity
2) Apply absorbent to the spill area
3) Place absorbent material into container
4) Utilize Floor Scrubber to remove any additional residue
5) Notify Rick Banwell for container labeling and disposal instructions

7.2.2 Large Spill (>5 gallons)

1) Seal all drains in the vicinity
2) Dike up to prevent migration of brine material
3) Utilize a wet dry vacuum to remove free liquid
4) Apply absorbent to the area
5) Place absorbent material in a sealed container
6) Notify Rick Banwell of spill for labeling and disposal instructions.

7.3 SPILL OF CLEANERS, AND SOLVENTS

7.3.1 Small Spill (<5 gallons)

1) Seal all floor drains in the vicinity
2) Apply absorbent material
3) Clean up and place absorbent material in a corrosion proof drum and seal
4) Contact Rick Banwell for labeling and disposal instructions
5) **NEVER WASH SPILLED SOLVENT DOWN A DRAIN**

7.3.2 Large Spill (> 5 gallons)

1) Seal all floor drains in the vicinity
2) Dike up to prevent migration of the spill
3) Contact Rick Banwell for additional instructions

7.4 SPILL OF INTERMEDIATE RAW MATERIALS

6.4.1 Small Spill (<5 gallons)

1) Seal all drains in the vicinity
2) Utilize a wet dry vacuum to remove free liquid
3) Apply absorbent to the area
4) Place absorbent material in a sealed container
5) Notify Rick Banwell about spill for labeling and disposal instructions.

6.4.2 Large Spill (>5 gallons)

1) Seal all drains in the vicinity
2) Dike of an area to prevent migration of brine material
3) Utilize a wet dry vacuum to remove free liquid
4) Apply absorbent to the area
5) Place absorbent material in a sealed container
6) Notify Rick Banwell about spill for labeling and disposal instructions.

8.0 Reporting

To comply with the permit requirements of the general NPDES discharge permit, it is required that all spills are responded to immediately and that there is documentation of the spill response and the initial response activities.

WRS has developed a standard spill response for any spills depending on the level of response required. **ALL SPILLS REQUIRE IMMEDIATE CLEAN-UP AND REPORTING TO WRS MANAGEMENT.**

WRS management shall contact the Michigan Department of Environmental Quality if any spill or loss of product, by-product, intermediate products, oils, solvents, waste material, or any other polluting substance (brine) which occurs to the surface waters or groundwaters of the state by calling the District Supervisor indicated on the certificate of coverage, or if the notice is provided after regular working hours call the Department of Environmental Quality's 24-hour Emergency response telephone number 1.800.292.4706. In addition, within 10 days of the spill or loss submit a full explanation as to the cause and discovery of the spill or loss, clean-up and recovery measures taken, preventative measures to be taken and schedule of implementation.

Documentation of spill response is required to be kept on site for a minimum of three (3) years after the incident.

Rev. 10/4/02

Spill Response Form

Williamsburg Receiving and Storage
10190 Munro Road
Williamsburg, MI

Date of Incident: _____ Time of Incident: _____

Date of Report: _____ Locations of Spill: _____

Name of Responder(s): _____

Spill Response Type
☐ Small Spill (<5 gallons)
☐ Large Spill (>5 gallons)

Substance Spilled
☐ Oil or Other Petroleum Based Products
☐ Brine
☐ Cleaners and Solvents
☐ Intermediate Products

Response Actions Taken (describe briefly):

_____

_____

_____

Actions taken or to be taken to prevent a release in the future:

_____

_____

_____

Additional Actions Remaining:
☐ Drum contents characterized and disposal
☐ Implementation of a Correction Action Plan
☐ Order additional supplies (advise office administrator)

Signature of Filer

_____
(date)

Signature of WRS Management

_____
(date)

Standard Operating Procedure No. 6

Loading and Unloading Transport Vessel

Williamsburg Receiving and Storage
10190 Munro Road
Williamsburg, Michigan

1.0 Introduction

The purpose of this Standard Operating Procedure (SOP) is to determine the Best Management Practices (BMP's) for loading and unloading product at Williamsburg Receiving and Storage

2.0 Referenced Documents
- 2.1 40 CFR Protection of Environmental, Chapter 1 Environmental Protection Agency, Subchapter D, Part 122- EPA Administered Permit Programs: The National Pollutant Discharge Elimination System
- 2.2 Standard Operating Procedure No. 2, Brine Transfer
- 2.3 Standard Operating Procedure No. 5, Spill Response, Pollution Prevention and Countermeasures

3.0 Terminology
- 3.1 Transport Vessel- Any vehicle that transports fresh cherries, brine cherries, by-products or finished products on local, state or federally maintained properties.
- 3.2 Absorbent Socks- Any spill prevention measure that will reduce the mobility of a spilled materials outside the desired area.

4.0 Significance and Use

Potential for accidental spills that may encounter storm water is increased during loading and unloading of these products from transport vehicles. Therefore, implementation of this SOP is intended to reduce the possibility of spills during transport of cherries, brine cherries, by-products or finished products.

5.0 Equipment

Spill Response Kit (SOP No. 5)
Fork Lift

6.0 Procedures:
- 6.1 Unloading of Transport Vehicles:
  - 6.1.1 Fresh cherries into brine pits
    - i. Transport vessels must remain on impervious surfaces at all times.
    - ii. Utilize absorbent sock around the truck to provide a "dike" so that any potential spills are prevented from migrating.
    - iii. Transport cherries into the pits as specified in SOP No.2- Brine Transfer

iv. Respond to any spills as specified in SOP No.5- Spill Response, Pollution Prevention and Countermeasures.

6.1.2 Brine cherries from outside locations

i. Transport vessel to remain on impervious surfaces

ii. If transport vessel is found to be leaking upon arrival, immediately isolate the transport vessel.
   a. Surround the truck with absorbent socks or booms
   b. Determine the cause of the leaking
   c. If possible utilize the wet-dry vacuum of other type device to capture any free liquid.

iii. If no viable signs of leaking are present
   a. Back truck into the loading dock
   b. Place absorbent socks

6.2 Loading of Transport Vehicles

6.2.1 Inspect the transport vehicle for safety and remaining residue to ensure that the truck is free of previous spills

6.2.2 Inspect the containers to be shipped for any potential spills or leaking containers.

6.2.3 Utilize containment socks around the ramp area, and around the truck to prevent any losses from migrating

6.2.4 Utilize standard industry packing techniques to load the transport vehicle

6.2.5 Inspect the transport vehicle prior to leaving the site

6.2.6 Respond to any spills as directed in SOP No. 5, Spill Prevention.

7.0 Reporting

Transporting Vessel Logs will be maintained in accordance with Williamsburg Receiving and Storages standard of practice, additional reporting is only required by this SOP by reference. For example, spill response.

Standard Operating Procedure No. 7

Procedure for Conducting Staff Training

Williamsburg Receiving and Storage
10190 Munro Road
Williamsburg, Michigan

1.0 Introduction

The purpose of this Standard Operating Procedure (SOP) is to provide procedures for conducting training of in-house staff members. Non compliance with procedures of these SOPs may result in an increased potential for a spill, release or risk of contamination. The procedures presented in these SOPs are designed to reduce the potential of a spill or release, or contamination of the site, and are designed to facilitate compliance with the WRS Storm Water Pollution Prevention Plan (SWPPP) and other Michigan Department of Environmental Quality (MDEQ) regulations.

2.0 Referenced Documents

2.1 Storm Water Pollution Prevention Plan (SWPPP) for Williamsburg Receiving and Storage (WRS) – maintained in the WRS Office

2.2 SOPs 1 through 8 listed below in Section 4.0

3.0 Terminology

3.1 Totes- Containment vessels for the storage of agricultural products such as cherries, apples or peaches

4.0 Significance and Use

The purpose of this SOP is to ensure that staff members are trained and knowledgeable in specific operations and activities conducted at the Williamsburg Receiving and Storage site. These operations and activities are presented in the following SOPs:

1. SOP-1 Storage and Cleaning of Totes
2. SOP-2 Brine Transfer
3. SOP-3 Sampling and Handling Procedures Associated with Storm water Monitoring
4. SOP-4 Sampling and Handling Storm Water in Brining Pits
5. SOP-5 Spill Response Pollution Prevention Procedures and Countermeasures
6. SOP-6 Loading and Unloading of Transport Vessels and Vehicles
7. SOP-8 Decontamination Procedures

Staff members should be trained upon hiring and annually thereafter.

5.0 Equipment

Appropriate knowledge of the subject matter being taught is necessary. Equipment necessary to conduct staff training may include the following items:

- Appropriate handouts, examples
- Examples

6.0 Procedure

Specific topics from each of the six SOPs are summarized below:

SOP-1 Storage and Cleaning of Totes

- Tote color
- Cleaning, sanitizing and cleaning materials
- Wash water collection and disposal
- Tote storage
- Reporting

SOP-2 Brine Transfer

- Prior to brine transfer
- Initial brine transfer
- Sulfate level check
- Transfer of cherries and brine mixture
- Documentation

SOP-3 Sampling and Handling Procedures Associated with Storm Water Monitoring

- Storm water event with significant sheet flow, and storm water collection
- Sampling parameters, containers and preservatives
- Record keeping

SOP-4 Sampling and Handling of Storm Water in Brine Pits

- Safety procedures
- Initial Sampling – Conductivity
- Secondary sampling
- Sampling parameters, containers and preservatives
- Post sampling

SOP-5 Spill Response Pollution Prevention and Countermeasures

- Spill prevention – Petroleum products and brine materials
- Spill prevention – Cleaners and solvents
- Spill prevention – Intermediate raw materials
- Spill response plans
- Reporting

SOP-6 Loading and Unloading Transport Vessels and Vehicles

- Unloading transport vehicles – Fresh cherries into brine pits
- Unloading transport vehicles – Brine cherries from outside locations
- Loading transport vehicles
- Reporting

SOP-8 Decontamination Procedures

Standard Operating Procedure No. 8

Decontamination Procedures

Williamsburg Receiving and Storage
10190 Munro Road
Williamsburg, Michigan

1.0 Introduction

This Standard Operating Procedure (SOP) defines the standard procedure for decontamination of sampling equipment used to sample storm water at the Williamsburg Receiving and Storage (WRS) site. This procedure is intended to be used together with other SOPs. Decontamination procedures will follow the procedures outlined in this SOP. This SOP is not intended to cover procedures for decontamination of equipment used to sample soil or groundwater.

2.0 Referenced Documents

2.1 SWPPP– Storm water Pollution Prevention Plan for WRS

3.0 Terminology

3.1 Storm water pit- A former brine pit reconfigured to store storm water

4.0 Significance and Use

The overall objective of the storm water sampling program is to obtain samples that accurately depict the chemical, physical, and/or biological conditions at the sampling site. Extraneous contaminant materials can be brought onto the sampling location and/or introduced into the medium of interest during the sampling program (e.g., by using equipment previously contaminated at another sampling location or job site).

Trace quantities of these contaminant materials can consequently be captured in a sample and lead to false positive analytical results and, ultimately, to an incorrect assessment of the contaminant conditions associated with the site. Decontamination of sampling equipment is therefore required after each use to ensure that sampling cross contamination is prevented, and that onsite contaminants are not carried offsite, or from one sampling location to another.

5.0 Equipment

The following is a list of equipment that may be needed to perform decontamination:

- Brushes (long handles)
- Washtubs or plastic buckets
- Sponges or paper towels
- Alconox (soap)
- Potable tap water
- Distilled Water

6.0 Procedure

6.1 Decontamination of Reusable Sampling Equipment

The following steps will be used to decontaminate sampling equipment:

- Personnel will dress in suitable safety equipment to reduce personal exposure. Appropriate dress will include work boots, long pants, latex gloves, and safety glasses.
- Equipment that will not be damaged by water will be placed in a bucket containing Alconox or low-sudsing detergent along with potable water and scrubbed with a bristle brush or similar utensil. Equipment will be rinsed with tap water in a second washtub followed by a distilled water rinse.
- Equipment that may be damaged by water will be carefully wiped clean using a sponge and detergent water and rinsed with distilled water. Care will be taken to prevent any equipment damage.

Following decontamination, equipment will be placed in a clean area or on clean plastic sheeting to prevent contact with contaminated soil. If the equipment is not used immediately, the equipment will be covered or wrapped in aluminum foil to minimize contact with potential airborne contamination.

6.2 Waste Management

Used wash and rinse solutions must be contained for disposal. Wash and rinse solutions may be discharged into the storm water pit. Latex gloves, paper towels and other solid waste should be collected in a plastic bag, sealed and placed in the municipal waste dumpster.

Standard Operating Procedure No. 9

Soil Erosion and Sedimentation Control

Williamsburg Receiving and Storage
10190 Munro Road
Williamsburg, Michigan

1.0 Introduction

As stated in the Industrial Storm Water Operator Training Manual, Sediment is one of the most widespread pollutants in surface water. It is generated from construction activities, bare soils around a facility, landfills, and stream-bank and stream-bed erosion caused by changes in hydrology. Many pollutants (nutrients, hydrocarbons, toxic substances) attach to sediment particles such as clay. Therefore, as sediment is carried to a waterbody, it can carry other pollutants with it. Even without attached pollutants, sediment can be very destructive to aquatic system by covering and damaging habitat.

2.0 Reference

2.1. Industrial Storm Water Operator Training Manual, Michigan Department of Environmental Quality
2.2. Storm Water Pollution Prevention Plan, Williamsburg Receiving and Storage, LLC.
2.3. Grand Traverse County Soil Erosion and Storm water runoff control ordinance

3.0 Definitions:

3.1. SWPPP- Storm water pollution prevention plan, Williamsburg Receiving and Storage, LLC.
3.2. Soil Erosion Control and Sedimentation Control Permit- A permit acquired prior to execution of work that is: within 500 feet of a wetland, disturbs more than 1 acres of land.
3.3. Earth Change- As defined in the GTC Soil Erosion and Storm water runoff control plan, A human-made change in the natural cover or topography of land, including cut and fill activities, which may result in or contribute to soil erosion or sedimentation of the water of the State. Earth change does not include the practice or plowing and tilling soil for the purpose of crop production.

4.0 Purpose and Scope:

As part of the agricultural nature at the site, there are several ways that sediments may encounter storm water. The purpose of this standard operating procedure is to minimize sediment transport through housekeeping practices at the site. In addition, this SOP can be utilized when preparing for Earth changes associated with a soil erosion control and sedimentation permit.

5.0 Applications

5.1. Sloped Banks

With the steep slopes that are present at the site it is necessary to keep vegetation growth established on the embankments at the site. The following procedures should be initiated if vegetative cover is eroded or otherwise compromised.

5.1.1. Shovel or Sweep up all sediment that was displaced
5.1.2. Apply grass seed to the bank
5.1.3. Stabilize bank and grass seed with hay or similar material
5.1.4. Utilize silt fence, as practical
5.1.5. Monitor growth, reapply grass seed as needed

5.2. Impervious Surfaces

Sediment is transferred to impervious surface through several mechanisms, these include wind and vehicular traffic, etc. It is therefore necessary to monitor the accumulation of sediment on impervious surface to minimize transport through storm water run-off. The following procedure should be initiated to minimize transport.

5.2.1. Daily inspections of the parking lot, addressing areas of accumulation
5.2.2. Sweeping entire parking lot, on a monthly basis or as needed.

5.3. Earth Changes-

Grand Traverse County requires acquisition of a Soil Erosion and Storm Water Runoff Control Permit control permit which disturbs one (1) or more acres or which are within 500 feet of the water's edge of the waters of the state. (Please refer to ordinance for exceptions). The following procedures may be used for exempt and non-exempt permit conditions.

5.3.1. Provide Silt fence around excavations
5.3.2. Provide hay or similar materials as a sediment barrier
5.3.3. Stabilize earth immediately
5.3.4. Re-seed, as appropriate

6.0 Recordkeeping

Although not required it may be necessary to document areas where response actions are necessary over the years so that appropriate actions can be taken to eliminate required responses.

Standard Operating Procedure No. 10

Annual Inspection and Reporting

Williamsburg Receiving and Storage, LLC.
10190 Munro Road
Williamsburg, MI

1.0 Introduction

The purpose of this Standard Operating Procedure (SOP) is to provide policies for conducting annual inspections of the facility to determine if there are any areas that require additional attention and/or modifications to the standards of procedure implemented for actions taken on the facility. The goal of this SOP is to identify those practices or procedures that will eliminate contact between plant operations and storm water.

2.0 Reference Documentation

- 2.1 General Permit-
- 2.2 Storm Water Pollution Prevention Plan, Williamsburg Receiving and Storage.
- 2.3 SOP No. 1- Standard Operating Procedure for Storage and cleaning of Totes
- 2.4 SOP No. 2- Standard Operating Procedure for Brine Transfer
- 2.5 SOP No. 5- Spill Response, Pollution Prevention Procedures and Countermeasures
- 2.6 SOP No. 6- Standard Operating Procedure for Loading and Unloading Transport Vessels.

3.0 Terminology

- 3.1 Annual – Once per calendar year

4.0 Significance and Use

Williamsburg Receiving and Storage, LLC. is responsible for maintaining practices at the facility to maintain compliance with the General National Pollution Discharge Elimination System (NPDES) Permit

5.0 Impervious Surfaces

Paved areas and roofs will be inspected for accumulation of sediment, or any other material that could adversely affect storm water at the site. Any observed areas of build up will be addressed and monitored to prevent build-up in the future.

Williamsburg Receiving and Storage, LLC.

Annual Audit
For
Storm Water Management Practices

Date: _____ Person Conducting Audit: _____

Date of Last Audit: _____

Record Keeping:

_____ Number of Tote Spilled since last audit
_____ Number of Releases responded to
_____Any Repetitive Releases

If yes, please list areas of concern:

_____
_____
_____

Site Observations:

New buildings or structures since last audit: _____
Observed Staining on-site: _____
Totes observed out-side the building: _____

Response Actions Required:

5.0 Tote cleaning

The current requirements of the waste water discharge permit require that all waste water not included within the waste water permit be hauled off-site for proper disposal.

Totes associated with the operations within the plant shall be yellow in color. Cleaning and sanitizing shall take place within the designated area of the plant and all wash water will be collected and transported offsite for disposal.

Washing of Blue and Gray totes shall commence in the west end of the maintenance building with proper measures taken to ensure that residual water be collected into the floor drain system that is connected with the frac tanks and off-site disposal.

Materials used in cleaning of totes will be limited to food safe bio-degradable products. Clean totes shall be stored separately from soiled totes, to eliminate repetitive cleanings, thereby reducing the amount of residual wash water.

Any and all totes found to be leaking will be immediately identified marked with a black "X" and isolated prior to removal from the site.

6.0 Tote storage

Tote storage will be limited to the interior of the on-site buildings. If necessary, **banded clean totes** may be temporarily stored on the exterior of the buildings.

Staking of totes shall be in such a manner that clean totes are segregated from those totes that require cleaning.

7.0 Reporting

Williamsburg Receiving and Storage is not required to keep an inventory of totes on site. However, any totes found to be leaking or otherwise compromised will be removed from use, appropriately cleaned and reported within the storm water pollution prevention plan (if appropriate).